

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Guadalupe Armando FLORES (YOB: 1978) MX
Nilda FLORES (YOB: 1978) USA

Case No. 7:22-mj-1340

United States Courts
Southern District of Texas
FILED

July 10, 2022

Nathan Ochsner, Clerk of Court

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 8, 2022 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 USC 841

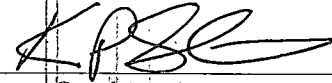
Possession with Intent to distribute approximately 3000 grams of cocaine a
schedule II controlled substance.

21 USC 846

Conspiracy to possess with intent to distribute approximately 3000 grams of
cocaine, a schedule II controlled substance.

This criminal complaint is based on these facts:

Continued on the attached sheet (Attachment I) and made a part hereof.

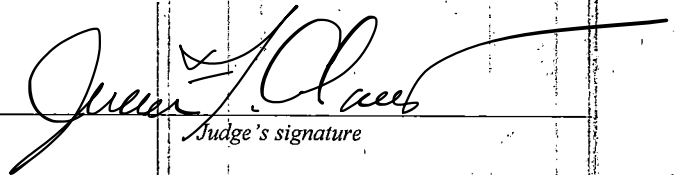
Submitted by reliable electronic means, sworn and attested to telephonically pursuant to Fed. R. Crim. P. 4.1 and
probable cause found on:☒ Continued on the attached sheet.

Complainant's signature

Kevin Sincerbox, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/10/22 @ 6:50p.m.

Judge's signature

City and state: McAllen, Texas

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

ATTACHMENT 1

1. On July 8, 2022, DEA McAllen received information that a drug trafficking organization (DTO) was attempting to coordinate the sale of approximately 3 kilograms of cocaine.
2. DEA Agents established surveillance at the predetermined meeting location in McAllen, Texas.
3. Agents observed a gray Ford pickup truck pull next to a black Ford pickup truck in a manner consistent with a narcotics transaction.
4. Agents then observed a dark gray Chevrolet pickup truck bearing Texas license plates PJR3080 drive up and stop directly behind the two vehicles in a manner consistent with a narcotics transaction.
5. At the same time, DEA Agents received information from a DEA undercover agent that 3 bundles, containing approximately 3 kilograms of suspected cocaine, were present in the dark gray Chevrolet pickup truck.
6. Agents observed the dark gray pickup truck drive away from the meeting location and drive west, loitering in a nearby park west of the meeting location.
7. DEA Agents requested the assistance of a Hidalgo County Sheriff's Deputy marked unit in the area to stop the gray Chevrolet Pickup truck based on the probable cause that a DEA undercover agent observed 3 kilograms of suspected cocaine in the vehicle.
8. The Hidalgo County marked unit activated its emergency lantern lights and sirens and pulled behind the gray Chevrolet and attempted to pull it over. The Chevrolet driver did not stop for the marked unit, and continued moving at a moderate rate of speed, appearing to head for a main road. Agents observed the vehicle gradually pickup speed and head for an exit from the park to a main road. Once the Chevrolet reached a main road, Agents observed the vehicle accelerate rapidly and begin to flee the marked unit at a high rate of speed in heavy traffic. A high speed vehicle pursuit occurred where agents witnessed the driver of the Chevrolet speeding, weaving through traffic, ignoring red lights, driving off road, and showing reckless disregard for the safety of others. The Chevrolet was eventually stopped and surrounded by backup marked police units.
9. Officers observed the passenger throw a black cooler bag out of the passenger window. The cooler bag was recovered immediately next to the vehicle and contained 3 bundles containing approximately 3 kilograms of suspected cocaine, consistent with the information provided by the DEA undercover agent.
10. The driver, identified as Nilda FLORES, and the passenger, Guadalupe FLORES, were placed under arrest. A minor child, approximately 2 years old, was present in the vehicle during the pursuit.
11. During a post-Miranda interview, Guadalupe FLORES gave a full confession of his involvement in the narcotics transaction.
12. Based on her conduct in evading police during the high speed vehicle pursuit, and the manner in which she drove up to the narcotics transaction to show the narcotics to the potential buyer, DEA Agents believe that Nilda FLORES clearly demonstrated that she was knowingly involved in the narcotics transaction. Additionally, based on training and experience, the use of a minor child in the vehicle is a common tactic used by traffickers

to avoid detection by law enforcement during narcotics transactions. The attempted transaction and pursuit were recorded.

13. The suspected narcotics were seized. They were field tested positive for the characteristics of cocaine and weighed approximately 3.25 kilograms.